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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:
ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

JOINT DISCOVERY STATUS REPORT

Pursuant to the Court's March 13, 2013 Case Management Order (Dkt. 350), the parties submit this joint discovery status report.

I. Status of Discovery

Since the March 22, 2013 Joint Discovery Status Report, the following depositions have taken place:

- Alex Lintner (Intuit) on March 25, 2013
- Kim Hoffman (Adobe) on March 27, 2013
- Rosemary Arriada-Keiper (Adobe) on March 28, 2013
- George Lucas (Lucasfilm) on March 28, 2013
- Tina Evangelista (Intel) on March 29, 2013
- John Warnock (Adobe) on March 29, 2013
- Mason Stubblefield (Intuit) on March 29, 2013
- Ann Reeves (Apple) on March 29, 2013

The following are the dates of outstanding depositions that have been or are being scheduled:

- Debbie Streeter (Adobe) on April 5, 2013
- Robert DeMartini (Intuit) on April 1, 2013
- Patrick Flynn (former Apple and former Google) on April 3, 2013
- Paul Schreiber (former Apple) on April 6, 2013
- Bob Mansfield (Apple) on April 11, 2013.
- Stephanie Buran (former third party employee) by April 15, 2013
- Sheryl Sandberg (former Google) on approximately April 23, 2013¹

Since the March 22, 2013 Joint Discovery Status Report, the parties have produced the following additional documents:

- Google produced 6 documents totaling 13 pages, including two spreadsheets responsive to Plaintiffs' follow-up requests regarding compensation, three calendar

¹ Plaintiffs respectfully request permission to depose Sheryl Sandberg after the fact discovery cutoff. Ms. Sandberg is a former Google executive and the current Chief Operating Officer of Facebook, a third party. Recent depositions, including the March 22, 2013 deposition of Larry Page and the March 25, 2013 deposition of Alex Lintner, confirmed her relevance to this case. Google agreed to permit her deposition to take place after the fact discovery cutoff. Ms. Sandberg and Facebook have not yet responded to a deposition subpoena Plaintiffs served, but Plaintiffs are prepared to accommodate any scheduling requests in light of Ms. Sandberg's schedule. The subpoena has not requested any documents from Ms. Sandberg. The fact that Google does not object to the scheduling of Ms Sandberg's deposition after the discovery cut off does not mean that Google believes Plaintiffs have a legal right to depose Ms. Sandberg or that her testimony will be relevant to any of Plaintiffs' claims. On the contrary, Google believes that Ms Sandberg is unlikely to offer any testimony that would be admissible or lead to admissible evidence.

entries responsive to Plaintiffs' requests for calendar entries from February 2005, and Sheryl Sandberg's employment agreement with Google.

- Intuit produced 1 document consisting of 2 pages.

II. Privilege Challenges

Plaintiffs have challenged privilege redactions to three Intel documents and one Google document. Plaintiffs are attempting to resolve these challenges with Intel and Google, but reserve the right to seek permission to move to compel production of withheld or redacted documents following the close of fact discovery.

Respectfully submitted,

Dated: March 29, 2013

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8 **ATTESTATION:** Pursuant to General Order 45, Part X-B, the filer attests that concurrence in
9 the filing of this document has been obtained from all signatories.
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